KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP

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Sean C. Southard Lauren C. Kiss Presentment Date: November 5, 2018 Presentment Time: 12:00 p.m. (EST)

Objection Deadline: November 5, 2018 at 11:00 a.m. (EST)

Counsel to the Debtor and Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NEW YORK

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In re : Chapter 11

DOWLING COLLEGE, :

f/d/b/a DOWLING INSTITUTE, : Case No. 16-75545 (REG)

f/d/b/a DOWLING COLLEGE ALUMNI ASSOCIATION,

ASSOCIATION, f/d/b/a CECOM,

a/k/a DOWLING COLLEGE, INC.,

Debtor. :

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NOTICE OF PRESENTMENT OF STIPULATION AND CONSENT ORDER APPROVING AND AUTHORIZING THE TURNOVER OF THE DEBTOR'S FEDERAL PERKINS LOAN PORTFOLIO

PLEASE TAKE NOTICE that on June 16, 2017, Dowling College ("<u>Dowling</u>" or the "<u>Debtor</u>"), debtor and debtor-in-possession in the above-captioned chapter 11 case (the "<u>Chapter 11 Case</u>"), filed the Debtor's Motion for an Order Approving and Authorizing Procedures for the Turnover of the Debtor's Federal Perkins Loan Portfolio (the "<u>Perkins Motion</u>") [DE 347]. On September 27, 2017, the Bankruptcy Court entered the Interim Order Approving and Authorizing Procedures for the Turnover of the Debtor's Federal Perkins Loan Portfolio [DE 407].

PLEASE TAKE FURTHER NOTICE that the Debtor shall present the annexed proposed Stipulation and Consent Order Approving and Authorizing the Turnover of the Debtor's Federal Perkins Loan Portfolio (the "Stipulation and Order"), which resolves all outstanding issues in the Perkins Motion, to the Honorable Robert E. Grossman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Eastern District of New York (the "Bankruptcy Court"), Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Courtroom

860, Central Islip, New York 11722 on **November 5, 2018 at 12:00 p.m.** (the "<u>Presentment Date</u>").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Stipulation and Order, or any portion thereof (an "Objection") shall be made in writing, filed with the Court by registered users of the Court's electronic case filing system and, by all other parties in interest, mailed to the Clerk of the United States Bankruptcy Court, Eastern District of New York, Alfonse M. D'Amato Federal Courthouse, 290 Federal Plaza, Central Islip, New York 11722, on a 3.5 inch floppy disc or compact disc, preferably in portable document Format (PDF), Microsoft Word, or any other Windows Based word processing format, and served upon (i) The Office of the United States Trustee for the Eastern District of New York, Alfonse D'Amato Federal Courthouse, 560 Federal Plaza, Central Islip, New York 11722, Attn: Stan Yang, Esq., Trial Attorney; (ii) counsel to the Debtor: Klestadt Winters Jureller Southard & Stevens, LLP, 200 West 41st Street, 17th Floor, New York, New York 10036, Attn: Sean C. Southard, Esq.: (iii) counsel to the Debtor's material prepetition and post-petition secured lenders: (a) Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo, P.C., One Financial Center, Boston, Massachusetts 02111, Attn: P. Miyoko Sato, Esq. and Ian A. Hammel, Esq., (b) White & Case LLP, 1221 Avenue of the Americas, New York, New York 10020, Attn: Brian D. Pfeiffer, Esq., (c) Certilman Balin Adler & Hyman, LLP, 90 Merrick Avenue, 9th Floor, East Meadow, NY 11554, Attn: Richard J. McCord, Esq. and Thomas J. McNamara, Esq., and (d) Garfunkel Wild, P.C., 111 Great Neck Road, Great Neck, NY Adam T. Berkowitz, Esq.; and (iv) counsel to the Creditors' Committee: SilvermanAcampora, LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: Ronald J. Friedman, Esq., so as to be received no later than 11:00 a.m. (Prevailing Eastern Time) on November 5, 2018 (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that unless a written Objection to the proposed order is timely filed prior to the Objection Deadline, together with proof of service, and delivered as set forth in the foregoing paragraph, there will not be a hearing and the Order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written Objection is timely filed by the Objection Deadline, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

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Dated: New York, New York October 25, 2018

KLESTADT WINTERS JURELLER SOUTHARD & STEVENS, LLP

By: /s/ Sean C. Southard

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